

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) Renewal
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Metalworking Lubricants Company
1509 South Senate Avenue,
Indianapolis, Indiana 46225**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-15365-00139	
Issued by: Originally signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: 10-27-2003 Expiration Date: 10-27-2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary waste oil recycling plant, using two boilers.

Authorized individual:	Plant Manager
Source Address:	1509 South Senate Avenue, Indianapolis, Indiana 46225
Mailing Address:	1509 South Senate Avenue, Indianapolis, Indiana 46225
General Source Phone:	(317) 269-2444
SIC Code:	2992
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) 350 HP Leffel boiler, 11.7 MMBtu/hr heat input capacity, installed 1987, Natural Gas and Distillate #4, Residual #4 and recycled Fuel Oil fired, identified as Emission Unit ID #1; and
- (b) 600 HP Kewanee boiler, 20.1 MMBtu/hr heat input capacity, installed May 1993, Natural Gas and Distillate #4, Residual #4 and recycled Fuel Oil fired, identified as Emission Unit ID #2.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Unit Heater - Maintenance, 130 MBH;
 - (2) Storage Heater - Maintenance, 175 MBH;
 - (3) Unit Heater 1 - Blending, 175 MBH;
 - (4) Unit Heater 2 - Blending, 175 MBH;
 - (5) Unit Heater 3 - Blending, 175 MBH;
 - (6) Make-up Unit - Blending, 175 MBH;

- (7) Unit Heater 1 - Water Treatment, 400 MBH;
 - (8) Unit Heater 2 - Water Treatment, 130 MBH;
 - (9) Unit Heater 3 - Water Treatment, 130 MBH;
 - (10) Make-up Unit - Water Treatment, 985 CFH;
 - (11) Individual Water Heater (temp.), 150 MBH;
 - (12) Space Heater 1 - Office, 115 MBH;
 - (13) Space Heater 2 - Office, 115 MBH;
 - (14) Space Heater 3 - Office, 130 MBH.
- (b) Propane Tank Forklift powered by internal combustion engine of capacity less than 500,000 Btu/hr;
 - (c) Petroleum fuel dispensing facility, having a storage capacity of less than 10,500 gallons;
 - (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
 - (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume;
 - (f) Paved and unpaved roads and parking lots with public access;
 - (g) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
 - (h) Blowdown for any of the following: sight glasses, boilers, compressors, pumps;
 - (i) A laboratory as defined in 326 IAC 2-7-1(21)(D), utilizing Freon (CFC 113) used in lab and recovered for reuse;
 - (j) Vent and scrubber system serving the outside oil processing tanks solely for odor control.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the OES to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the OES.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and the OES within a reasonable time, any information that IDEM, OAQ, and the OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and the OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ and the OES, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, and the OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and the OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the OES. IDEM, OAQ, and the OES, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

City of Indianapolis OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ and the OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ and the OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or the OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or the OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or the OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or the OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and the OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.
 - (2) If IDEM, OAQ and the OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and the OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and the OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and the OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, the OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on April 2, 1996. The plan consists of:

- (a) The application of wet dust suppression on as needed basis with 0.2 gallons per square yard of calcium chloride.

C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.11 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the OES, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the OES, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.12 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68, is present at a source in more than a threshold quantity, source must comply with the applicable requirements of 40 CFR 68.

**C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and the OES, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ and OES of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) 350 HP Leffel boiler, 11.7 MMBtu/hr heat input capacity, installed 1987, Natural Gas and Distillate #4, Residual #4 and recycled Fuel Oil fired, identified as Emission Unit ID #1; and
- (b) 600 HP Kewanee boiler, 20.1 MMBtu/hr heat input capacity, installed May 1993, Natural Gas and Distillate #4, Residual #4 and recycled Fuel Oil fired, identified as Emission Unit ID #2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Fuel Usage Limitation [326 IAC 7-1.1-1] [326 IAC 12-1] [326 IAC 2-8-4]

- (a) The following limits shall apply for the 11.7 million Btu per hour boiler (emissions unit EU#1):
 - (1) The sulfur content of distillate oil combusted shall not exceed 0.5% by weight.
 - (2) The sulfur content of residual oil and recycled oil combusted shall not exceed 1.04% by weight.
 - (3) The total gallons of recycled oil, residual oil and the distillate oil equivalence for residual oil combusted in the 11.7 MMBtu per hour boiler (emissions unit EU #1) shall not exceed 715.20 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The distillate oil equivalence shall be calculated by multiplying the amount distillate oil combusted by a correction factor of 0.447.

Compliance with these limitations on the sulfur content and amount of fuel oils combusted shall assure compliance with the requirement of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) and the requirement to limit SO₂ emissions to less than 100 tons per twelve consecutive month period such that 326 IAC 2-7 (Part 70) does not apply.
- (b) The sulfur content of fuel oil combusted in the 20.1 million Btu per hour boiler (emissions unit EU#2) shall not exceed to 0.5% by weight. Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction. This limitation on the sulfur content of fuel oils combusted satisfies the requirement of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), 40 CFR 60.42c (d) (Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and the requirement to limit SO₂ emissions to less than 100 tons per twelve consecutive month period such that 326 IAC 2-7 (Part 70) shall not apply.

D.1.2 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the 11.7 MMBtu per hour heat input boiler shall be limited to 0.57 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the 20.1 MMBtu per hour heat input boiler shall be limited to 0.44 pounds per MMBtu heat input.

Above emission rates were based on the calculations using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input.

Q = total source maximum operating capacity rating in million Btu per hour

D.1.3 HAPs [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) the HCl emissions from recycled fuel oil combusted in the two (2) boilers shall not exceed 8.6 tons per 12 consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of HCl and any combination of HAPs to less than 10 and 25 tons per 12 consecutive month period, respectively. Compliance with this limit makes 326 IAC 2-7 not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

- (a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Analyzing each batch of recycled oil delivered to the fuel tank to determine the sulfur content of the oil via on-site certified laboratory analysis.

D.1.6 Chlorine Content

Compliance shall be determined utilizing one of the following options.

The Permittee shall analyze the recycled oil sample to determine the chlorine content of the oil via on-site certified laboratory analysis, as follows:

- (a) Oil samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; or
- (b) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the two (2) boilers shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and burning oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.1(a), the Permittee shall maintain records of the monthly sum of distillate and residual oil combusted in the 11.7 million Btu per hour boiler (emission unit EU# 1).
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Results of filled-tank recycled oil analysis (percent chlorine by weight);
 - (3) A certification, signed by the owner or operator, that the results of fuel oil analysis represent all of the recycled fuel oil combusted during the period; and
 - (4) Monthly amount of recycled fuel oil combusted and calculated HCl emissions. Monthly HCl emissions shall be calculated as follows:
$$E = A \times B \times C \times D \times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$

Where A = The recycled oil usage, in kilogallons per month.
B = The density of recycled oil, lb of oil/kgal.
C = Weight % chlorine in recycled oil
D = Stoichiometric ratio of HCl produced per mole of Cl₂ reacted (73/71)
E = Monthly HCl emissions
- (5) The weight of HCl emitted for each compliance period.
- (d) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the two (2) boilers once per shift.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

- (a) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

D.1.10 Used Oil Requirements [329 IAC 13]

The waste oil burned in the two (2) boilers shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),

- (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Metalworking Lubricants Company
Source Address: 1509 South Senate Avenue, Indianapolis IN 46225
Mailing Address: 1509 South Senate Avenue, Indianapolis IN 46225
FESOP No.: F097-15365-00139

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

**2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Metalworking Lubricants Company
Source Address: 1509 South Senate Avenue, Indianapolis IN 46225
Mailing Address: 1509 South Senate Avenue, Indianapolis IN 46225
FESOP No.: F097-15365-00139

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Metalworking Lubricants Company
Source Address: 1509 South Senate Avenue, Indianapolis IN 46225
Mailing Address: 1509 South Senate Avenue, Indianapolis IN 46225
FESOP No.: F097-15365-00139

9	Natural Gas Only	
9	Alternate Fuel burned	
	From: _____	To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Metalworking Lubricants Company
Source Address: 1509 South Senate Avenue, Indianapolis IN 46225
Mailing Address: 1509 South Senate Avenue, Indianapolis IN 46225
FESOP No.: F097-15365-00139
Facility: EU#1 and EU#2
Parameter: Hydrogen Chloride (HCl)
Limit: The HCl emissions from recycled fuel oil combusted in the two (2) boilers shall not exceed 8.6 tons per 12 consecutive month period, with compliance determined at the end of each month. The fuel usage shall be calculated as follows:

$$E = A \times B \times C \times D \times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$

Where A = The recycled oil usage, in kilogallons per month.
 B = The density of recycled oil, lb of oil/kgal.
 C = Weight % chlorine in recycled oil
 D = Stoichiometric ratio of HCl produced per mole of Cl₂ reacted (73/71)
 E = Monthly HCl emissions

Year: _____

Month	HCl emissions this month (tons)	HCl emissions previous 11 months (tons)	HCl emissions last 12 months (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Metalworking Lubricants Company
Source Address: 1509 South Senate Avenue, Indianapolis IN 46225
Mailing Address: 1509 South Senate Avenue, Indianapolis IN 46225
FESOP No.: F097-15365-00139
Facility: EU#1
Parameter: Sulfur Dioxide (SO₂)
Limit: The total gallons of recycled oil, residual oil and the distillate oil equivalence for residual oil combusted in the 11.7 MMBtu per hour boiler (emissions unit EU #1) shall not exceed 715.20 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month and the maximum sulfur content of the recycled oil and the residual oil shall not exceed 1.04% by weight.

YEAR: _____

Month	Recycled Oil, Residual Oil (& equivalents) usage this month (gallons)	% sulfur by weight of recycled and residual oil combusted this month	Recycled Oil, Residual Oil (& equivalents usage) previous 11 months (gallons)	% sulfur by weight of recycled and residual oil combusted previous 11 months	Recycled Oil, Residual Oil (& equivalents usage) last 12 months (gallons)	% sulfur by weight of recycled and residual oil combusted last 12 months
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Metalworking Lubricants Company
Source Address: 1509 South Senate Avenue, Indianapolis IN 46225
Mailing Address: 1509 South Senate Avenue, Indianapolis IN 46225
FESOP No.: F097-15365-00139

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Addendum to the
Technical Support Document for a Federally Enforceable State Operating
Permit (FESOP) Renewal**

Source Name: Metalworking Lubricants Company
Source Location: 1509 South Senate Avenue, Indianapolis, Indiana 46225
County: Marion
SIC Code: 2992
Operation Permit No.: F097-15365-00050
Permit Reviewer: Alic Bent / EVP

On August 5, 2003, the Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) had a notice published in The Indianapolis Star in Indianapolis, Indiana, stating that Metalworking Lubricants Company had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal relating to the operation of a waste oil recycling plant. The notice also stated that OAQ and OES proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On September 2, 2003, Ed Pierce, Environmental Engineer of Andrews Environmental Engineering, Inc submitted comments on the proposed FESOP renewal permit on behalf of Metalworking Lubricants Company. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Revise permit condition D.1.6 by adding an additional sub-condition allowing each batch of recycled oil delivered to the fuel tank to be analyzed for CI content, similar to condition D.1.5(b) for sulfur content determination.

Response 1

Condition D.1.6 already allows for the recycled oil delivered to the fuel tank to be analyzed for CI content via on-site certified laboratory analysis. Therefore, there are no changes to the permit due to this comment.

Comment 2

Modify permit conditions D.1.8(c)(2) and (4) to reflect that the records required under these conditions may also be based on the results of each batch of recycled oil in lieu of the results of the filled-tank recycled oil analysis.

Response 2

The Permittee is currently required to maintain records of the results of the recycled oil analysis, monthly amount of recycled fuel oil combusted and the calculated HCl emissions. The recycled oil analysis must reflect the results of the filled-tank analysis because unlike batch analysis, filled-tank analysis shows the content of oil as used. Therefore, the OAQ and OES believe that maintaining the requisite records are reasonable requirements. There are no changes to the permit due to this comment.

Comment 3

Modify the HCl emissions equation listed on the HCl quarterly report table to be consistent with the change requested above for permit condition D.1.8(c)(4).

Response 3

The Permittee must demonstrate compliance with the HCl emissions from recycled fuel oil combusted in the two (2) boilers at the end of each month. It is OAQ and OES intent that continuous compliance with the HAP limit specified in the permit be demonstrated and, as such, the need for reporting on a monthly basis. There will be no changes to this condition in the permit due to this comment.

The following revisions have been made to the Technical Support Document under the Unrestricted Potential Emissions and Potential to Emit sections (**bolded** language has been added, the language with a line through it has been deleted). The OAQ and OES prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OES has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Condition B.10 (Compliance with Permit Conditions) has been removed from the B section and has been added to the FESOP title page instead.

~~B.10 — Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

~~———— (a) — The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~———— (1) — Enforcement action;~~

~~———— (2) — Permit termination, revocation and reissuance, or modification; and~~

~~———— (3) — Denial of a permit renewal application.—~~

- ~~———— (b) ——— It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~
- ~~———— (c) ——— An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY

and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Metalworking Lubricants Company
1509 South Senate Avenue,
Indianapolis, Indiana 46225**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. Condition C.16 (b)(3) notification requirement has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ and OES an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify** the IDEM, OAQ and OES ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: Metalworking Lubricants Company
Source Location: 1509 South Senate Avenue, Indianapolis, Indiana, 46225
County: Marion
SIC Code: 2992
Operation Permit No.: F097-15365-00139
Permit Reviewer: Alic Bent/EVP

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) have reviewed a FESOP renewal application from Metalworking Lubricants Company relating to the operation of a stationary waste oil recycling plant. Metalworking Lubricants Company was issued FESOP 097-5659-00139 on September 30, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) 350 HP Leffel boiler, 11.7 MMBtu/hr heat input capacity, installed 1987, Natural Gas and Distillate #4, Residual #4 and recycled Fuel Oil fired, identified as Emission Unit ID #1; and
- (b) 600 HP Kewanee boiler, 20.1 MMBtu/hr heat input capacity, installed May 1993, Natural Gas and Distillate #4, Residual #4 and recycled Fuel Oil fired, identified as Emission Unit ID #2.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Unit Heater - Maintenance, 130 MBH;
 - (2) Storage Heater - Maintenance, 175 MBH;

- (3) Unit Heater 1 - Blending, 175 MBH;
 - (4) Unit Heater 2 - Blending, 175 MBH;
 - (5) Unit Heater 3 - Blending, 175 MBH;
 - (6) Make-up Unit - Blending, 175 MBH;
 - (7) Unit Heater 1 - Water Treatment, 400 MBH;
 - (8) Unit Heater 2 - Water Treatment, 130 MBH;
 - (9) Unit Heater 3 - Water Treatment, 130 MBH;
 - (10) Make-up Unit - Water Treatment, 985 CFH;
 - (11) Individual Water Heater (temp.), 150 MBH;
 - (12) Space Heater 1 - Office, 115 MBH;
 - (13) Space Heater 2 - Office, 115 MBH;
 - (14) Space Heater 3 - Office, 130 MBH.
- (b) Propane Tank Forklift powered by internal combustion engine of capacity less than 500,000 Btu/hr;
 - (c) Petroleum fuel dispensing facility, having a storage capacity of less than 10,500 gallons;
 - (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
 - (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume;
 - (f) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
 - (g) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
 - (h) Blowdown for any of the following: sight glasses, boilers, compressors, pumps;
 - (i) A laboratory as defined in 326 IAC 2-7-1(21)(D), utilizing Freon (CFC 113) used in lab and recovered for reuse;
 - (j) Vent and scrubber system serving the outside oil processing tanks solely for odor control.

Existing Approvals

(a) FESOP 097-5659-00139, issued on September 30, 1997.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on December 28, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A: pages 1 through 6 of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	45.0
PM-10	46.6
SO ₂	218.6
VOC	1.0
CO	12.2
NO _x	21.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/yr)
Arsenic	less than 10
Cadmium	less than 10
Chromium	less than 10
HCl	greater than 10
Lead	less than 10
Nickel	less than 10
TOTAL	greater than 25

- (a) The unrestricted potential emissions of SO₂ is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on September 30, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP 097-5659-00139, issued on September 30, 1997.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boilers (EU#1 and EU#2)	4.32	6.61	99.74 ⁽¹⁾	0.77	4.97	19.88	8.6 ⁽²⁾ (HCl)
Insignificant Activities ⁽³⁾	0.16	0.16	0.008	0.08	0.455	1.363	negl.
Total PTE After Issuance	4.48	6.77	< 100	0.85	5.42	21.24	< 10 (single HAP) < 25 (total HAPs)

Note: 9.99 tons of PM after control are attributed to fugitive emissions from gravel parking lot. Fugitive emissions are not counted in determining Part 70 applicability since this source is not included on the list of 28.

- (1) Reflects fuel usage limit of Condition D.1.1(c).
- (2) Reflects HAP limit to comply with 326 IAC 2-8 (FESOP).
- (3) Insignificant Activity - natural gas combustion.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 emission data.

Pollutant	Actual Emissions (tons/year)
PM	5.26
PM-10	2.80
SO ₂	0.21
VOC	0.29

CO	4.57
NO _x	5.37
HAP	no data

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.
- (b) Marion County has been classified as attainment or unclassifiable for PM-10, SO₂, NO_x, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

- (a) EU #2 at this source is subject to the New Source Performance Standard for Small Industrial - Commercial - Institutional Steam Generator Units, 40 CFR Part 60.40c, Subpart Dc (326 IAC 12). This rule applies to steam generating units for which construction, modification or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu per hour or less, but greater than or equal to 10 MMBtu per hour.

The 20.1 MMBtu per hour boiler (emission unit EU#2) is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because it was constructed after June 9, 1989 (in 1993) and has a heat input capacity greater than 10 million Btu per hour. The NSPS limits the sulfur content of fuel oil combusted to no greater than 0.5 percent by weight.

Based on the information submitted, the source complies with this federal regulation by using fuel oil with a sulfur content less than 0.5% by weight.

The 11.7 MMBtu per hour boiler (emissions unit EU#1) is not subject to the New Source Performance Standard for Small Industrial - Commercial - Institutional Steam Generator Units, 40 CFR Part 60.40c, Subpart Dc (326 IAC 12), because it was constructed prior to June 9, 1989.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

This source is not one of the twenty-eight (28) listed sources and the potential to emit of all criteria pollutants are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. All the significant units at this source were constructed before 1997, therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO_x and is located in Marion County. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8-4 (Federally Enforceable State Operating Permit)

Pursuant to 326 IAC 2-8-4, the following limits shall apply:

- (a) The total gallons of recycled oil, residual oil and the distillate oil equivalence for residual oil combusted in the 11.7 MMBtu per hour boiler (emission unit EU #1) shall not exceed 715.20 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month and the sulfur content of the recycled oil and the residual oil shall be limited to less than 1.04% by weight. The distillate oil equivalence shall be calculated by multiplying the amount distillate oil combusted by a correction factor of 0.447. This limit is required to limit the potential to emit sulfur dioxide (SO₂) from the source to less than 100 tons per 12 consecutive month period. Therefore, 326 IAC 2-7 does not apply.
- (b) The NSPS limits the sulfur content of fuel oil combusted to no greater than 0.5 percent by weight for the 20.1 MMBtu per hour boiler (emission unit EU#2). Compliance with this limit will also limit the potential to emit sulfur dioxide (SO₂) from the source to less than 100 tons per 12 consecutive month period. Therefore, 326 IAC 2-7 does not apply.
- (c) The potential to emit NO_x from natural gas combustion for a total heat input of 31.8 MMBtu per hour from the two (2) boilers at 8,760 hr/yr is less than 100 tons per year (21.24 tons per year, Appendix A. page 2 of 11). Therefore, limiting NO_x based on natural gas combustion is not necessary.
- (d) The potential to emit of HCl from recycled fuel oil combusted in the two (2) boilers shall not exceed 8.6 tons per 12 consecutive month period, with compliance determined at the end of each month. The fuel usage shall be calculated as follows:

$$E = A \times B \times C \times D \times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$

Where A = The recycled oil usage, in kilogallons per month.
B = The density of recycled oil, lb of oil/kgal.
C = Weight % chlorine in recycled oil

- D = Stoichiometric ratio of HCl produced per mole of Cl_2 reacted (73/71)
E = Monthly HCl emissions

This usage limit is required to limit the source-wide potential to emit of HCl and any combination of HAPs to less than 10 and 25 tons per 12 consecutive month period, respectively. Compliance with this limit makes 326 IAC 2-7 not applicable.

326 IAC 5-1 (Opacity Limitations)

This source is located in Marion County, in Indianapolis, Indiana; therefore it is subject to the stricter opacity limitation of 326 IAC 5-1-2(2). Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-1 (Particulate Limitations - Marion County)

This rule applies to specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit of 100 tons per year (tpy) or more actual emissions of 10 tpy or more of PM.

The source is located in Marion County, a specifically listed county. The source and its facilities are not specifically listed at 326 IAC 6-1-12 and, therefore, the requirements of 326 IAC 6-1-12 do not apply. The PTE of PM for the source is less than 100 tpy and the actual source PTE of PM is less than 10 tpy. Therefore, the requirements of 326 IAC 6-1 do not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter emission Limitations)

This source is subject to 326 IAC 6-5 because it has potential fugitive particulate matter emissions of more than twenty-five (25) tons per year. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the control plan submitted on April 2, 1996. The plan consists of wet dust suppression on as needed basis with 0.2 gallons per square yards of calcium chloride applied monthly.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Both boilers (emissions units EU#1 and EU#2) are subject to the particulate matter limitations of 326 IAC 6-2-4(a) for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, each of the boilers is limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input.

Q = total source max. indirect heater input. As each new indirect heating facility is added to the plant Q increases. As a result progressively newer facility will have a more stringent PM emissions limitation.

Facility	Heat input capacity (MMBtu/hr)	Q, Total Source Maximum Operating Capacity (MMBtu/hr)	Pt, Pounds of PM emitted per million Btu of heat input.
Leffel boiler	11.7	11.7	0.57
Kewanee boiler	20.1	31.8	0.44

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(1), the boilers (EU#1 and EU#2) are exempt from 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because they are indirect heating facilities.

326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

Both boilers (emission units EU#1 and EU#2) are subject to the Sulfur Dioxide Emissions Limitation Regulation 326 IAC 7-1.1-2 because the potential SO₂ emissions from each of these facilities exceed 25 tons per year. Pursuant to 326 IAC 7-1.1-2 the SO₂ emissions limitation for the 11.7 and 20.1 MMBtu per hour boilers is 1.6 lb/MMBtu for residual oil and 0.5 lb/MMBtu for distillate oil based on a calendar month average.

The SO₂ emissions from the 20.1 MMBtu per hour boiler are also regulated under NSPS Subpart Dc. The SO₂ emissions limitation under Subpart Dc is 0.5 lb/MMBtu for all oil combustion based on a 30 day average or as an alternative fuel oil with sulfur content of not greater than 0.5 percent.

Testing Requirements

There are no testing requirements for this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous

compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. EU#1 and EU#2 has applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of EU#1 and EU#2 shall be performed during normal daylight operations when combusting fuel oil in boilers. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure that the PM emissions limitation is not violated.

Conclusion

The operation of this a stationary waste oil recycling plant shall be subject to the conditions of the attached proposed FESOP No.: F097-15365-00139.

Appendix A: Emission Calculations

Company Name: Metalworking Lubricants Co.
Address City IN Zip: 1509 South Senate Avenue, Indianapolis, IN 46225
Plt ID: F097-15365-00139
Reviewer: Alic Bent/EVP
Date: July 16, 2003

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Insignificant Natural Gas Combustion	Boilers #1 and #2	Gravel Lot	TOTAL
PM	0.16	4.86	39.96	45.0
PM10	0.16	6.49	39.96	46.6
SO2	0.01	218.59	0.00	218.6
NOx	1.36	19.88	0.00	21.2
VOC	0.08	0.95	0.00	1.0
CO	0.46	11.69	0.00	12.2
total HAPs	neg.	75.66	0.00	75.7
worst case single HAP	neg.	73.48	0.00	73.5
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Insignificant Natural Gas Combustion	Boilers #1 and #2	Gravel Lot	TOTAL
PM	0.16	4.32	9.99	14.5
PM10	0.16	6.61	9.99	16.8
SO2	0.01	99.74	0.00	99.8
NOx	1.36	19.88	0.00	21.2
VOC	0.08	0.77	0.00	0.9
CO	0.46	4.97	0.00	5.4
total HAPs	neg.	< 25	0.00	< 25
worst case single HAP	neg.	< 8.6	0.00	< 10
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Potential Emissions (PTE) Calculations**Fuel Oil and Natural Gas****Company Name:** Metalworking Lubricants Co.**Address:** 1509 South Senate Avenue, Indianapolis, IN 46225**Plt ID:** F097-15365-00139**Reviewer:** Alic Bent/EVP**Date:** March 6, 2003**BOILERS OPERATING PARAMETERS**

Emission Unit #	HP	MMBtu/hr=(HP)x(3.3446x10 ⁻²) (AP-42, App.A-13)
1	350	11.7
2	600	20.1

Fuel	Heat Capacity MMBtu/kgal or Btu/scf	Boiler #1 Firing Rate kgal/hr or MMscf/hr	Boiler #2 Firing Rate kgal/hr or MMscf/hr	Maximum Sulfur content of fuel, percentage by weight	Maximum Ash content of fuel, percentage by weight
Distillate Oil #2	140	0.0836	0.1433	0.5	NA
Residual Oil #4	150	0.0780	0.1338	1.6	0.1
Recycled Oil (a)	146	0.0802	0.1374	1.6	0.1
Natural Gas	1000	0.0117	0.0201	NA	NA

(a) The heat content, % sulfur by weight and % ash by weight of recycled oil was assumed the same as worst case conditions for residual oil.

EMISSION FACTORS

Fuel	Units	PM-10 (c)	PM	SO ₂	NO _x	CO	VOC(b)
Distillate #2	lbs/kgal	1.1	2	70	20	5	0.2
Residual #4	lbs/kgal	4.5	7	234	20	5	0.2
Recycled Oil	lbs/kgal	5.1	6.4	229	19	5	1
Natural Gas	lbs/MMscf	7.6	1.9	0.6	100	84	5.5

b) The VOC emission factor for recycled oil reflects TOC

c) Emissions factors - natural gas, distillate oil, residual oil and recycled oil from AP-42: tables 1.3-1, 1.4-1, 1.4-2, 1.11-1 and 1.11-2.

POTENTIAL EMISSIONS (AP-42 Emissions Factors)

Boiler #1

Fuel	PM-10	PM	SO ₂	NO _x	CO	VOC
Distillate #2	0.40	0.73	25.48	7.32	1.83	0.07
Residual #4	1.54	2.39	79.99	6.84	1.71	0.07
Recycled Oil	1.79	2.25	80.53	6.67	1.76	0.35
Natural Gas	0.39	0.10	0.03	5.13	4.31	0.28
Maximum:	1.79	2.39	80.53	7.32	4.31	0.35

Boiler #2

Fuel	PM-10	PM	SO ₂	NO _x	CO	VOC
Distillate #2	0.69	1.26	43.68	12.56	3.14	0.13
Residual #4	2.64	4.10	43.07	11.72	2.93	0.12
Recycled Oil	3.07	3.85	138.06	11.44	3.01	0.60
Natural Gas	0.67	0.17	0.05	8.79	7.38	0.48
Maximum:	3.07	4.10	138.06	12.56	7.38	0.60

	PM-10	PM	SO ₂	NO _x	CO	VOC
Boilers #1&2	4.86	6.49	218.59	19.88	11.69	0.95
Insignif. Activities	0.163	0.163	0.008	1.363	0.455	0.084
Total Potential Emissions(d)	5.02	6.66	218.60	21.24	12.15	1.04

Sulfur Content Limitations

The source has accepted a sulfur emissions rate limit of 1.04478 lbs/MMBtu on the 11.7 MMBtu/hr boiler to allow combustion of a larger amount of fuel in this boiler.

Type of Fuel	Regulatory Cite	Limit (Lbs/MMBtu)	Heating Value for type fuel (MMBtu/gal)	AP-42 Emissions Factor	Maximum allowed % Sulfur
Distillate #2 used in 11.7 MMBtu/hr Boiler and all fuel oil in 20.1 MMBtu/hr Boiler	326 IAC 7-1.1-2(a)(3) and 40 CFR 60.42 (Subpart Dc)	0.5	0.14	142	0.493
Residual #4 and recycled oil used in the 11.7 MMBtu/hr boiler	326 IAC 7-1.1-2(a)(2) and 326 IAC 2-8	1.04478	0.150	150	1.04

$$(0.5 \text{ lbs/MMBtu}) \times (1000\text{gal}/142 \text{ lbs}) \times (.14 \text{ MMBtu/gal}) = 0.49 \%S$$

$$(1.04478 \text{ lbs/MMBtu}) \times (1000\text{gal}/150 \text{ lbs}) \times (.150 \text{ MMBtu/gal}) = 1.04478 \%S$$

FUEL USAGE RESTRICTION FOR BOILER #1:

$((100 \text{ tons/yr} - 43.95 \text{ tons/yr} - 0.008 \text{ tons/yr}) \times 2000 \text{ lbs/ton}) / 1.04478 \text{ lbs/MMBtu}$

107280.00 MMBtu/yr

715.20 kilogallons of residual oil per year

Where 43.95 tons of SO2 represents the limited PTE from boiler #2

0.008 tons of SO2 represents the potential emissions from insignificant emitting activities.

CONVERSION FACTORS FOR MULTIPLE FUEL LIMIT:

	lbs/MMBtu	lbs/Kgal	Correction Factor
Residual	1.04478	157	1.000
Distillate	0.5	70	0.447

LIMITED PTE

$(\text{lbs/MMBtu}) \times (\text{MMBtu/hr}) / (\text{Kgal/hr}) = \text{lbs/Kgal}$

Boiler #1

Fuel	firing rate kgal/yr or MMscf/yr	Maximum sulfur content of fuel % by weight	PM-10	PM	SO2	NOx	CO	VOC
ResidualOil #4	715.20	1.04	1.553	2.503	55.79	7.152	1.788	0.072
Recycled Oil	0.00	1.04	0.000	0.000	0.00	0.000	0.000	0.000
Distillate Oil #2	732.47	0.49	1.590	0.732	25.64	7.325	1.831	0.073
Natural Gas	102.55	NA	0.702	0.154	0.03	7.178	1.795	0.282

Boiler #2

Fuel	firing rate kgal/yr or MMscf/yr	Maximum sulfur content of fuel % by weight	PM-10	PM	SO2	NOx	CO	VOC
Residual Oil #4	1171.9	0.49	2.545	4.102	43.07	11.719	2.930	0.117
Recycled Oil	0.0	0.49	0.000	0.000	0.00	0.000	0.000	0.000
Distillate Oil #2	1255.7	0.49	2.727	1.256	43.95	12.557	3.139	0.126
Natural Gas	175.79	NA	1.204	1.204	0.05	12.305	3.076	0.483

Total worse-case emissions from Significant Emitting Activities: **4.32** **6.61** **99.74** **19.88** **4.97** **0.77**

Insignificant Activities

	PM-10	PM	SO2	NOx	CO	VOC
Natural Gas (see emissions calc for Insignificant Activities)	0.163	0.163	0.008	1.363	0.455	0.084

Total Limited PTE Source Wide: **4.48** **6.77** **99.75** **21.24** **5.43** **0.85**

Fugitive Emissions from Gravel Lot

Emissions estimated using AP-42 Section 13.2.2 calculations

$E = k \cdot (5.9)^s \cdot [s/12] \cdot [S/30] \cdot [W/3]^{0.7} \cdot [w/4]^{0.5} \cdot [(365-p)/365] = E \text{ (lbs/VMT)}$

k =	1	particulate size multiplier
s =	8.9	silt content of road surface %
S =	5	mean vehical speed (mph)
W =	40	mean vehical weight (tons)
w =	12	mean number of wheels
p =	150	number of days with atleast 0.1 inches of PPT per year
E =	4.56	lbs/VMT

$UcE = E \cdot D \cdot N$

E =	4.56	lbs/VMT
D =	0.1	Distance of one way trip
N =	10	maximum amount of round trips made by all vehicles
UcE =	9.12	lbs/hr, uncontrolled
	39.96	tons.yr, uncontrolled

$CE = UcE \cdot (1 - p)$

p =	75.00%	control efficiency for applying 0.2 gallons per yard of calcium chloride per month (Figure 13.2.2-2)
Control Emissions =	9.99	tons/yr

Insignificant Emitting Activities

Facility	Heat input capacity (MMBtu/hr)
Unit Heater Maintenance	0.13
Storage Heater	0.175
Unit Heater #1 Blending	0.175
Unit Heater #2 Blending	0.175
Unit Heater #3 Blending	0.175
Make-up Heater	0.6
Unit Heater #1 Water Treatment	0.4
Unit Heater #2 Water Treatment	0.13
Unit Heater #3 Water Treatment	0.13
Make-up Unit Water Treatment	0.95
Ind Water Heater	0.15

Total Heat Input Capacity for units with heat input less than .3 MMBtu/hr	1.24 MMBtu/hr	0.0012 MMcf/hr
Total Heat Input Capacity for units with heat input greater than .3 MMBtu/hr	1.95 MMBtu/hr	0.0019 MMcf/hr

Emissions from Insignificant Emitting Activities

Fuel	SCC #	Units	PM	SO2	NOx	CO	VOC
Natural Gas < 0.3	NA	lbs/MMcf	11.18	0.60	94	21	7.26
Natural Gas > 0.3 & <10	(10300603)	lbs/MMcf	12	0.60	100	40	5.28

Fuel	Units	PM	SO2	NOx	CO	VOC
Natural Gas < 0.3	(tons/yr)	0.06	0.00	0.51	0.11	0.04
Natural Gas > 0.3 & <10	(tons/yr)	0.10	0.01	0.85	0.34	0.05

Total Emissions from Insignificant Emitting Activities	0.16	0.01	1.36	0.46	0.08
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HAP Emissions From Recycled Oil

Boiler #1	683.64 Kgal/yr
Boiler #2	1,171.95 Kgal/yr
Total	1,855.58 Kgal/yr

Max% by weight Chlorine 1.20

Max. % by weight Lead 0.04 (typical value used in AIRS, the highest value noted in the vermont waste oil study was 96.8 ppm or 0.0001% by weight)

Pollutant	Emissions Factors	Units	Potential (tons/yr)
Lead	2.20E+00	lbs/1000 gal	2.04
HCl	7.92E+01	lbs/1000 gal	73.48
Asenic	1.10E-01	lbs/1000 gal	0.10
Cadmium	9.30E-03	lbs/1000 gal	0.01
Chromium	2.00E-02	lbs/1000 gal	0.02
Nickel	1.10E-02	lbs/1000 gal	0.01
Total Emissions (tons/yr)			75.66

Limited PTE

The source requested that the HAP emissions from recycled oil be calculated using a sliding scale expressing the relative chlorine concentrations in recycled oil relative to amount that can be burned. Therefore, limited PTE shall be determined using the following equation:

$$E = A \times B \times C \times D \times (1 \text{ ton}/2000 \text{ lbs})$$

where:

A = The recycled oil usage, kilogallons/month

B = Density of recycled oil, lb oil/kgal

C = Chlorine weight % in recycled oil, %

D = Stoichiometric ratio of HCl produced per mole of Cl_2 reacted (73/71)

E = Monthly Emissions of HCl, tons/month

Note: For this calculation 100% conversion of Cl_2 to HCl is assumed.